

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PA PAH PRODUCTIONS, INC. and ELGIN
BAYLOR LUMPKIN p/k/a GINUWINE,

Plaintiffs,

v.

KING MUSIC GROUP, INC., KING MUSIC
GROUP, LLC, M&A HOLDINGS, LLC,
MICHAEL BOURNE and DOES 1-10, inclusive,

Defendants.

) ECF Case

)

)

) Civil Action No. 08 CV 0391 (AKH)

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) **MOTION TO ADMIT COUNSEL PRO
HAC VICE**

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PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Joseph N. Froehlich, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

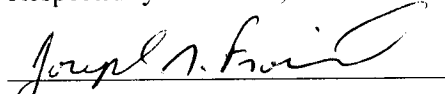
Applicant's Name:	Brandon J. Witkow
Firm Name:	Locke Lord Bissell & Liddell LLP
Address:	300 South Grand Avenue, Eighth Floor
City/State/Zip:	Los Angeles, California 90071-3119
Phone Number:	213-687-6781
Fax Number:	213-341-6781

Mr. Witkow is a member in good standing of the Bars of the States of California and Georgia. There are no pending disciplinary proceedings against Brandon J. Witkow in any State or Federal court.

Dated: February 20, 2008

City, State: New York, New York

Respectfully submitted,



Joseph N. Froehlich (JF 5221)
jfroehlich@lockelord.com
Locke Lord Bissell & Liddell LLP
885 Third Avenue, 26th Floor
New York, New York 10022
(212) 947-4700 (Telephone)
(212) 947-1202 (Fax)

Attorneys for Plaintiffs Pa Pah Productions, Inc. & Elgin Baylor Lumpkin p/k/a Ginuwine

90 925-642735 FEB 21 2008

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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) ECF Case

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) **AFFIDAVIT OF JOSEPH N. FROEHLICH**
) **IN SUPPORT OF MOTION TO ADMIT**
) **COUNSEL PRO HAC VICE**

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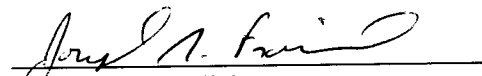
I, JOSEPH N. FROEHLICH, hereby declare as follows:

1. I am a partner at Locke Lord Bissell & Liddell LLP, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Brandon J. Witkow as counsel pro hac vice to represent Plaintiffs in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1997. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Brandon J. Witkow since 2007.
4. Mr. Witkow is an associate at Locke Lord Bissell & Liddell LLP in Los Angeles, California.
5. I have found Mr. Witkow to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Brandon J. Witkow, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Brandon J. Witkow, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Brandon J. Witkow, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

I declare under penalty of perjury under the laws of the State of New York that the foregoing is true and correct and that this Declaration was executed on February 20, 2008 in New York, New York.

Respectfully submitted,


Joseph N. Froehlich

SDNY Bar Code: JF 5221

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PA PAH PRODUCTIONS, INC. and ELGIN) ECF Case
BAYLOR LUMPKIN p/k/a GINUWINE,)
)
Plaintiffs,) Civil Action No. 08 CV 0391 (AKH)
)
v.) ORDER FOR ADMISSION PRO HAC
) VICE ON WRITTEN MOTION
KING MUSIC GROUP, INC., KING MUSIC)
GROUP, LLC, M&A HOLDINGS, LLC,)
MICHAEL BOURNE and DOES 1-10, inclusive,)
)
Defendants.)

Upon the motion of Joseph N. Froehlich, attorney for Plaintiffs Pa Pah Productions, Inc. & Elgin Baylor Lumpkin p/k/a Ginuwine, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Brandon J. Witkow

Firm Name: Locke Lord Bissell & Liddell LLP

Address: 300 South Grand Avenue, Eighth Floor

City/State/Zip: Los Angeles, California 90071-3119

Telephone/Fax: 213-687-6781(t)/ 213-341-6781(f)

Email Address: bwitkow@lockelord.com

is admitted to practice pro hac vice as counsel for Plaintiffs Pa Pah Productions, Inc. & Elgin Baylor Lumpkin p/k/a Ginuwine in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

City, State: New York, New York

United States District/Magistrate Judge



THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

January 29, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, BRANDON JAY WITKOW, #210443 was admitted to the practice of law in this state by the Supreme Court of California on December 1, 2000; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert
Custodian of Membership Records



STATE BAR OF GEORGIA

Lawyers Serving the Public and the Justice System

Mr. Brandon Jay Witkow
Locke Lord Bissell & Liddell LLP
300 South Grand Avenue, Suite 800
Los Angeles, CA 90071

CURRENT STATUS: Active Member-Good Standing

DATE OF ADMISSION TO PRACTICE: 05/31/2005

Attorney Bar Number: 141976

Today's Date: January 23, 2008

Listed below are the public disciplinary actions, if any, which have been taken against this member:

State Disciplinary Board Docket #	Supreme Court Docket #	Disposition
N/A	N/A	N/A

The prerequisites for practicing law in the State of Georgia are as follows:

- Must be certified by the Office of Bar Admissions, either by Exam, or on Motion (Reciprocity).
- Sworn in to the Superior Court in Georgia, which is the highest court needed for individuals to practice law in the State of Georgia.
- Enrolled with the State Bar of Georgia, which is an arm of the Supreme Court of Georgia.

Attorneys licensed in Georgia and whose membership is current are eligible to practice law in Superior Court. Attorneys may, upon application, apply for admission to the Supreme, District and State Court of Appeals.

Under the privacy/confidentiality provision of the Bar Rule 4-221(d), any complaint against a member resolved prior to the filing and docketing of a disciplinary case in the Supreme Court is not a matter of public record, and may not be revealed without a waiver from the member. It is the policy of the State Bar of Georgia to answer any inquiry about a member by disclosing only those complaints that have been docketed in the Supreme Court. With respect to matters that are currently pending as active, undocketed cases, when an inquiry is received, the State Bar of Georgia shall not disclose the existence of those complaints. Such non-disclosure should not be construed to confirm the existence of confidential complaints since the vast majority of members in good standing are not the subjects of such confidential complaints.

This member is currently in "good standing" as termed and defined by **State Bar Rule 1-204**. The member is current in license fees and is not suspended or disbarred as of the date of this letter.

STATE BAR OF GEORGIA

Judy Hill

Official Representative of the State Bar of Georgia

HEADQUARTERS

104 Marietta Street, Suite 100
Atlanta, Georgia 30303
(404) 527-8700 ■ (800) 334-6865
FAX (404) 527-8717
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SOUTH GEORGIA

244 E. Second Street (Zip 31794)
P.O. Box 1390
Tifton, Georgia 31793-1390
(229) 387-0446 ■ (800) 330-0446
FAX (229) 382-7435

**UNITED STATES DISTRICT
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CERTIFICATE OF SERVICE

STATE OF NEW YORK)
SS.:
COUNTY OF NEW YORK)

I, Gerry M. O'Leary, being duly sworn, deposes and says:

I am not a party to the within action, I am over 18 years of age, and am a Paralegal for attorneys, LOCKE LORD BISSELL & LIDDELL LLP, attorneys for the Plaintiff in the above-captioned action.

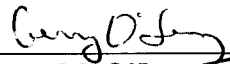
I certify and declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that on February 20, 2008, I served a copy of MOTION TO ADMIT COUNSEL [BRANDON J. WITKOW] PRO HAC VICE, AFFIDAVIT OF JOSEPH N. FROELICH IN SUPPORT OF MOTION TO ADMIT COUNSEL [BRANDON J. WITKOW] PRO HAC VICE and [PROPOSED] ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION upon:

Jonathan D. Davis, Esq.
99 Park Avenue
Suite 1600
New York, NY 10016
(212) 687-5464

by mailing the copy via first-class mail to the address of the counsel set forth above.

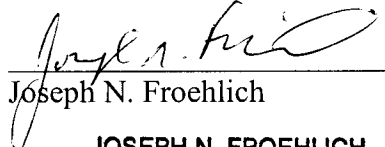
I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
February 20, 2008



Gerry M. O'Leary
Paralegal
Locke Lord Bissell &
Liddell LLP
885 Third Avenue
New York, New York 10022
(212) 812-8330

SWORN TO BEFORE ME THIS
20th day of February, 2008



Joseph N. Froehlich

JOSEPH N. FROEHLICH
Notary Public, State of New York
No. 02FR6002500
Qualified in Suffolk County
Commission Expires February 9, 20 10